



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

June 19, 2020

Via Delivery as Email-attachment

Mr. Prashant K. Gupta  
Honeywell, Inc.  
115 Tabor Road  
Morris Plains, NJ 07950

Re: CO2 Sparging Phase 4 Full Implementation and Monitoring Report Revision 1 dated June 2020; OU2 (Mercury Cell Buildings and Groundwater) (Phase 4 Sparge Report, Rev. 1) and Response to EPA Comments on Revision 0 of the Phase 4 Sparge Report: LCP Chemicals National Priorities List Site, Brunswick, Glynn County, GA

Dear Mr. Gupta:

The purpose of this letter is to inform you your submission of the response to comments on the CO2 Sparging Phase 4 Full Implementation and Monitoring Report, Revision 0 dated December 20, 2019 (Phase 4 Sparge Report, Rev. 0) is acceptable and addresses EPA's comments. Furthermore, the EPA considers the Phase 4 Sparge Report, Rev. 1 to be adequate for its intent and the final version in accordance with the Administrative Order on Consent for Removal Action (CERCLA Docket-04-2007-3760). The objectives for conducting the sparging were to: 1) reduce the pH of the CBP to between 10 and 10.5; and 2) reduce the density of the CBP. EPA concurs that the sparging events have been successful in reducing the pH and density of the CBP in the majority of the groundwater sampled at the LCP Site.

However, as noted in the EPA comment letter on the Phase 4 Sparge Report, Rev. 0 there remain areas of the plume that have elevated mercury in groundwater. To help facilitate the reduction of mercury at the Site, additional injections of CO2 or other actions may be needed in the future. Please also note that additional groundwater monitoring to evaluate pH rebound is still needed, and that at least one area of elevated pH remains upgradient of the former Cell Building Area. EPA requests the area continue to be monitored and evaluated the Remedial Investigation Report and Feasibility Study are developed and finalized.

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If you have questions regarding the preceding, please contact me at [ [HYPERLINK "mailto:pope.robert@epa.gov"](mailto:pope.robert@epa.gov) ] or at my cell phone number (404.272.5799).

Sincerely,

Robert H. Pope, Senior Remedial Project Manager  
Superfund Restoration & Sustainability Branch  
Superfund & Emergency Management Division

cc: J. McNamara, GAEPD

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